

# **EXHIBIT 8**

**DECLARATION OF KIMBERLY CRAWLEY**

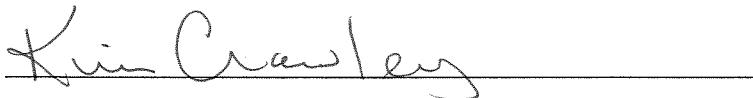
COMES NOW, Kimberly Crawley and pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. My name is Kimberly Crawley, and I am over 18 years old. I have personal knowledge of the facts as stated herein.
2. I am the parent of I.C., who is thirteen years old and is in sixth grade at Trailside Middle School, which is part of Loudoun County Public Schools. I.C. has been diagnosed with a medical respiratory disability that makes him severely prone to infections. I.C. has had twelve surgeries in his right lung, which is half the size of his left lung. These conditions substantially limit his major life activities, such as breathing and the functions of the respiratory system.
3. These conditions put I.C. at a higher risk for severe complications if he were to become infected with COVID-19. I.C. is at a heightened risk from COVID-19 even after being vaccinated and boosted.
4. I.C. attended school virtually for the 2020-2021 school year. Virtual learning made it difficult for I.C. to access speech and language services, and made it nearly impossible to speak to his peers in a productive way. A lot of accommodation was required for I.C. to be heard in a virtual setting. In-person instruction provides the best mode of instruction for my child's educational needs and overall wellbeing.
5. His doctors have recommended the family to follow the CDC guidelines of universal masking at all times because I.C. is at a heightened risk of becoming infected with COVID-19.

6. Because Trailside Middle School continues to require all students and staff to wear masks despite Executive Order 2, I.C. can attend in-person school safely. He wears a KN95 mask all day.
7. There is currently no virtual school option for I.C for the 2021-2022 school year. Even if there was a virtual school option available, it does not provide an equitable educational experience for my child.
8. After the issuance of Executive Order Number 2, several parents have filed suit against Loudoun County School Board for enforcing their current mask mandate. Governor Youngkin has requested to intervene in this lawsuit. Also as a result of this Order, some families and students have protested against Loudoun County Public School's mask mandate and the division is facing pressure to remove the mandate. This makes me concerned that Loudoun County Public Schools may make masking optional.
9. On the advice of my pediatrician, if there is no longer a mask mandate in Loudoun County Public Schools, I will have to choose between sending I.C. to school where his health and safety is at heightened risk or withdrawing I.C. from school and risking his educational progress.
10. I am seeking to have Executive Order 2 blocked so that my school will be able to require universal masking as necessary to meet its obligations to my child.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 8 day of February, 2022 at Ashburn, Virginia.



Kim Cramley

Kimberly Crawley